

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Jane Doe,

Plaintiff,

v.

Amazon.com, Inc., et al.,

Defendants.

No. 2:11-CV-01709-MJP

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINES
RELATING TO JOINT STATUS
REPORT AND DISCOVERY PLAN**

**Noted for Consideration:
December 13, 2011**

STIPULATION

WHEREAS Defendants Amazon.com, Inc. and IMDB.com, Inc. ("Defendants") filed a Motion to Dismiss Pursuant to Rule 10(a) (Dkt. 12) (the "Motion"), noted for consideration on December 2, 2011;

WHEREAS Plaintiff Jane Doe filed an Opposition to Defendants' Motion to Dismiss Pursuant to Rule 10(a) and Cross-Motion to Proceed Anonymously (Dkt. 25) (the "Cross-Motion"), noted for consideration on December 2, 2011; and

WHEREAS Plaintiff and Defendants (the "Parties") anticipate that the Court's ruling on the Motion and Cross-Motion will implicate the discovery plan such that engaging in a conference pursuant to Federal Rule of Civil Procedure 26(f) and adhering to related deadlines would be rendered moot and/or the Parties would be forced to duplicate their efforts by filing an amended discovery plan after the Court's ruling;

STIPULATION AND [PROPOSED] ORDER TO
EXTEND DEADLINES RELATING TO JOINT
STATUS REPORT AND DISCOVERY
PLAN (No.2:11-CV-01709) – 1

24976-0480/LEGAL22312914.2

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

NOW, THEREFORE the Parties hereby stipulate and request that the schedule regarding the Joint Status Report and Discovery Plan, Dkt. No. 19, be adjusted as follows:

	Current Date	Proposed Date
Deadline for FRCP 26(f) Conference	12/13/2011	14 days after Court's ruling on the Motion and Cross-Motion, unless the Court dismisses the Complaint with prejudice
Initial Disclosures Pursuant to FRCP 26(a)(1)	12/20/2011	28 days after Court's ruling on the Motion and Cross-Motion, unless the Court dismisses the Complaint with prejudice
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Rule 16	12/27/2011	35 days after Court's ruling on the Motion and Cross-Motion, unless the Court dismisses the Complaint with prejudice

1 **IT IS SO STIPULATED.**
2
3
4

5 DATED: December 13, 2011

PERKINS COIE LLP

6
7 By: s/ Breena M. Roos

8 Breena M. Roos #34501
9

10 Attorneys for Defendants Amazon.com, Inc. and
11 IMDB.com, Inc.
12

13
14 DATED: December 13, 2011

DOZIER INTERNET LAW, P.C.

15
16
17 By: /s/ John W. Dozier

18 John W. Dozier, Jr., VSB No. 20559

19 jwd@cybertriallawyer.com
20
21

22 **NEWMAN DU WORS LLP**

23
24 Derek A. Newman, Esq., WSBA No. 26967

25 Randall Moeller, Esq., WSBA No. 21094

26 randy@newmanlaw.com

27 derek@newmanlaw.com
28

29 Attorneys for Plaintiff Jane Doe
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51

ORDER

IT IS SO ORDERED.

DATED this ____ day of _____, 2011.

Marsha J. Pechman
United States District Court

STIPULATION AND [PROPOSED] ORDER TO
EXTEND DEADLINES RELATING TO JOINT
STATUS REPORT AND DISCOVERY
PLAN (No.2:11-CV-01709) – 4
24976-0480/LEGAL22312914.2

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

CERTIFICATE OF SERVICE

I certify that on December 13, 2011, I electronically filed the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES RELATING TO JOINT STATUS REPORT AND DISCOVERY PLAN** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record

John W. Dozier, Jr.
Dozier Internet Law, P.C.
11520 Nuckols Rd., Ste 101
Glen Allen, VA 23059

___ Via hand delivery
___ Via U.S. Mail, 1st Class, Postage Prepaid
___ Via Overnight Delivery
___ Via Facsimile
___ Via Email
X Via ECF

Randall Moeller
Derek Alan Newman
Newman Du Wors LLP
1201 Third Avenue, Ste 1600
Seattle, WA 98101

___ Via hand delivery
___ Via U.S. Mail, 1st Class, Postage Prepaid
___ Via Overnight Delivery
___ Via Facsimile
___ Via Email
X Via ECF _____

I certify under penalty of perjury that the foregoing is true and correct.

DATED this 13th day of December, 2011.

s/ Breena M. Roos

Elizabeth McDougall, WSBA No. 272026
Breena M. Roos, WSBA No. 34501
Ashley Locke, WSBA No. 40521

Perkins Coie LLP

1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
Telephone: 206.359.8000
Facsimile: 206.359.9000
E-mail: emcdougall@perkinscoie.com
E-mail: broos@perkinscoie.com
E-mail: alocke@perkinscoie.com

Attorneys for Defendants Amazon.com, Inc.
and IMDb.com, Inc.